

AO93 Search and Seizure Warrant

UNITED STATES DISTRICT COURT

for the  
District of Arizona

In the Matter of the Seizure of  
A pink Glock 48, serial number BLBK401, a dark colored  
Glock 26 Gen 5, serial number ADKY571, a box with the  
words "DO NOT OPEN OR ELSE" on its exterior, which  
contains an improvised explosive device, ammunition,  
magazines, and original boxed packaging for the firearms and  
ammunition.

Case No. 23-9162 MB

SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the seizure of the following property located in the District of Arizona:

As further described in Attachment A.

I find that the affidavit(s), or any recorded testimony, establish probable cause to seize the property described above.

**YOU ARE COMMANDED** to execute this warrant on or before 3/24/2023 (not to exceed 14 days)  
☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to any United States Magistrate Judge on criminal duty in the District of Arizona.

☐ I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized ☐ for 30 days (not to exceed 30) ☐ until, the facts justifying, the later specific date of \_\_\_\_\_.

Date and time issued: 3/10/2023@7:30am

Eswillett  
Judge's signature

City and state: Phoenix, Arizona

Honorable Eileen S. Willett, U.S. Magistrate Judge  
Printed name and title

**ATTACHMENT A**

*Property to be seized*

1. A pink Glock 48, serial number BLBK401, a dark colored Glock 26 Gen 5, serial number ADKY571, ammunition, magazines, and original boxed packaging for the firearms and ammunition.

2. A small box secured with a padlock with the words "Do Not Open Or Else" written on it, containing an improvised explosive device that had been constructed from a grenade shell, which at one time was inert, and had been filled with a substance that investigators believed to be black powder.

AO 106 Application for a Search Warrant

## UNITED STATES DISTRICT COURT

for the  
District of Arizona

In the Matter of the Seizure of  
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Glock 26 Gen 5, serial number ADKY571, a box with the  
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magazines, and original boxed packaging for the firearms and  
ammunition.

Case No. 23-9162 MB

## APPLICATION FOR A SEIZURE WARRANT

I, a federal law enforcement officer or an attorney for the government, request that the following property located  
in the District of Arizona be seized:

## As further described in Attachment A

The basis for the search under Fed. R. Crim. P. 41(c) is:

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code/Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in Possession of a Firearm
26 U.S.C. § 5861(d) and 5871	Possession of an Unregistered Firearm

The application is based on these facts:

## See attached Affidavit of Special Agent Holly Riley

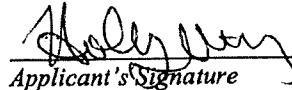
☒ Continued on the attached sheet.

☐ Delayed notice of 30 days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested  
under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Reviewed by AUSA RYAN GOLDSTEIN



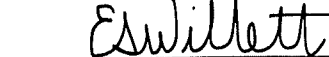
Sworn to telephonically and signed electronically.

Date: 3/10/2023 @ 7:30amCity and state: Phoenix, Arizona


Applicant's Signature

Holly Riley, FBI Special Agent

Printed name and title



Judge's signature

Honorable Eileen S. Willett, U.S. Magistrate Judge

Printed name and title

**ATTACHMENT A**

*Property to be seized*

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**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

I, Holly K. Riley, Special Agent of the Federal Bureau of Investigation ("FBI"), Phoenix, Arizona being first duly sworn, hereby deposes and states as follows:

**I. INTRODUCTION AND AGENT BACKGROUND**

1. Your Affiant makes this Affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to seize two firearms more particularly described in Attachment A, which represent evidence, fruits, and/or instrumentalities of the criminal violations further described below.

2. Your Affiant is a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI") and has been so employed since January 19, 2021. As a requirement of becoming a Special Agent, your Affiant attended the FBI 22-week training academy located in Quantico, Virginia. While at the FBI training academy, your Affiant received instruction in investigative techniques. Your Affiant has received advanced training from multiple law enforcement agencies on drug trafficking topics, including the handling of controlled substances, money laundering, and technique of investigating drug organizations.

3. Since graduating from the academy, your Affiant has been assigned to the Transnational Organized Crime squad, which investigates drug trafficking and organized crime matters. During that time, I have participated in hundreds of controlled substance investigations. In the course of conducting controlled-substance investigations, I have made contacts with, and participated in interviews of, persons involved in the distribution of illegal drugs and the movement of proceeds from illegal drugs. From this experience and consultation, I have gained knowledge of the activities of those involved in drug-related crimes, including the devices, applications, and social media platforms they use to communicate, the terminology commonly used, and the methods used to avoid detection by law enforcement.

4. Based on your Affiant's training and experience, and the experience of fellow law enforcement officers with whom your Affiant works and with whom she shares information on a daily basis, I have gained knowledge regarding the practices of drug trafficking organizations and the best methods of investigating them. I know that drug-trafficking organizations ("DTOs"), including the transnational DTO discussed below, typically use a number of methods to insulate their drug-related criminal activities from law enforcement detection. Your Affiant knows, based on training and experience, that drug trafficking organizations routinely use several operational techniques to sustain their drug-related criminal enterprise. These practices are designed and implemented to achieve two goals. The first goal is the successful facilitation of the organization's illegal activities. These activities consist of the importation or smuggling of drugs across the United States-Mexico border, the distribution of the drugs throughout the United States, and the subsequent remittance of the drug proceeds. The second goal is the minimization of the exposure of organization members, particularly those operating in leadership roles, from investigation and prosecution by law enforcement. Your Affiant knows, based on training and experience, DTOs routinely compartmentalize their drug-related criminal operations. The compartmentalization of operations reduces the amount of knowledge possessed by each member of the organization. This method of operation effectively minimizes the potential damage a cooperating individual could inflict on the organization and further reduces the adverse impact of a particular law enforcement action against the organization. To effectively manage and coordinate the illegal activities, however, upper management of the organization must maintain regular contact with each compartment. Your Affiant knows, based on training and experience, that DTOs possess a level of sophistication that necessitates that virtually all phases of their illegal activities be conducted as separate operations. These separate operations include: the receipt and transportation of drugs across the United States-Mexico border; the transportation and distribution of drugs to

destination markets in the United States; the transportation of cash proceeds from the destination markets to the DTO heads and sources of supply; and the laundering of cash proceeds in the United States.

5. As a Special Agent, I have performed various tasks, including:

(a) Functioning as a surveillance agent, thus observing and recording movements of persons trafficking in controlled substances and those suspected of trafficking in controlled substance;

(b) Interviewing witnesses, cooperating individuals, and informants regarding trafficking of controlled substances, and the distribution of currency and assets derived from the trafficking of controlled substances (money laundering); and

(c) Functioning as a case agent; supervising and directing actions of an enforcement group to accomplish the objectives of specific investigations.

6. Prior to being employed by the FBI, I obtained a master's degree from Arizona State University in Spanish linguistics. Further, I taught Spanish for approximately 10 years, at both the university and high school levels. I am fluent in both English and Spanish reading, writing, and speaking. Accordingly, I am able to translate written and spoken communications from Spanish to English or from English to Spanish. I can also communicate with Spanish-speaking witnesses and confidential sources.

7. The facts contained in this Affidavit are based in part on information provided to your Affiant by other law enforcement officers, either directly or indirectly through their reports or affidavits; surveillance conducted by law enforcement officers; intercepted messages; and analysis of telephone toll records. Your Affiant also relies on my own experience, training, and background in evaluating this information.

8. Because this Affidavit is being submitted for the limited purpose of establishing probable cause for the requested warrant, your Affiant has not set forth all of the relevant facts known to law enforcement officers.

## **II. PROBABLE CAUSE**

9. On March 9, 2023, agents executed federal search warrant 23-5087MB at 1804 W. Tuckey Lane, Apartment 13, Phoenix, Arizona 85015. This residence is a one-bedroom apartment, where Jada CUE (CUE) and Jordan Dreckmeier (DRECKMEIER) reside. CUE is the only female known to live at the residence. During the execution of the search warrant, CUE told investigators that there were firearms in the residence. During the search of the residence, investigators found two firearms in the top right drawer of the dresser in the bedroom. The firearms were located next to official Scottsdale Court documents that named CUE. Additionally, a prescription pill bottle for CUE was found in the drawer as well as female undergarments. One of the firearms found was a pink Glock 48, serial number BLBK401. The second firearm found was a dark colored Glock 26 Gen 5, serial number ADKY571. The firearms are not manufactured in Arizona and thus were shipped or transported in interstate or foreign commerce. Investigators also found 814 ammunition in a grocery bag in the living room in this residence. The firearms and ammunition are currently being secured at the FBI Phoenix Division Office in accordance with FBI policy and procedure.

10. During the execution of federal search warrant 23-5087MB referenced above, investigators found a small box that was secured with a padlock. On the outside of the box, the words "Do Not Open Or Else" had been written. To ensure the safety of everyone in the house, investigators asked DRECKMEIER, who had been Mirandized and had not waived his rights, if the contents of the box would hurt anyone. DRECKMEIER initially responded with silence and then stated that there was a grenade in the box. Upon opening the box, investigators found an improvised explosive device ("IED") that appeared



to be a grenade inside. FBI and ATF bomb technicians were called and asked to respond to the residence. Further inspection of the IED by bomb technicians indicated that it had been constructed from a grenade shell, which at one time was inert, and had been filled with a substance that investigators believed to be black powder. Additionally, it appeared that a detonator had been added to the device. The device was then taken by bomb technicians for further analysis, which showed that the black powder inside the grenade shell was energetic when subjected to an IST test. Based on the knowledge, training, and experience of an ATF Senior Explosives Enforcement Officer, the device found in the box appeared to be a functional, improvised explosive grenade and would be considered a destructive device as that term is defined in 26 U.S.C. 5845(f). ATF also confirmed that the IED was not registered in the National Firearms Registration and Transfer Record.

11. On January 14, 2022, the Maricopa County Superior Court, State of Arizona, convicted CUE of Solicitation to Commit Narcotic Drug Possession For Sale, a Class 4 Felony, in violation of Arizona Revised Statutes (A.R.S.) section 13-3408(A)(2). For this offense, the Maricopa County Superior Court sentenced CUE to serve 6 months in the Maricopa County Jail followed by three years of probation. Therefore, CUE is prohibited from possessing a firearm.

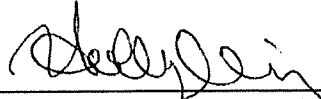
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**III. CONCLUSION**

12. Your Affiant submits there is probable cause to believe that the firearms listed in Attachment A, are items illegally possessed, and constitute evidence, and/or instrumentalities of a violation of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm), 26 U.S.C. § 5861(d) and 5871 (Possession of an Unregistered Firearm).



Special Agent Holly K. Riley  
Federal Bureau of Investigation

Subscribed electronically and sworn to telephonically on this 10 day of  
March, 2023.



HONORABLE EILLEN S. WILLETT  
United States Magistrate Judge